

## 39501-SITE 8 INCINERATION 21.02.08.0015

## Meeting Minutes 28th Street Dioxin Delineation NCBC Gulfport, MS May 31, 1995

## Attendees:

Jerry Banks	MSDEQ	(601)	961-5221
Gordon Crane	NCBC Gulfport	(601)	871-2485
Sally Wilson	NCBC Gulfport	(601)	871-2484
Art Conrad	SouthDiv	(803)	743-0520
Louis Vazquez	SouthDiv	(803)	743-0613
Dan Owens	${ t SouthDiv}$	(803)	743-0331
Penny Baxter	ABB-ES	(615)	531-1922
Kurt Sichelstiel	ABB-ES	(615)	531-1922

A meeting was held at Building 1 conference room, NCBC Gulfport, MS on May 31, 1995 at 9:00 am. The purpose of the meeting was to present to and discuss with the State the findings of the sampling for dioxin near the 28th Street road project.

After introductions were made, Sally Wilson gave a briefing of the events that have led to the current status of the 28th Street road project. The project is part of the Defense Access Road program, a cooperative effort between Federal, State, local and city funding. The project was conceived nearly 10 years ago and included upgrading of the 28th Street area between Gate 7 and Canal Road, including replacement of a bridge crossing Turkey Creek on Canal Road. This work is intended to facilitate mobilization of military equipment during times of conflict. A start date of April 3, 1995, was set. In late March or early April the presence of dioxin was discovered in outfalls transecting this highway project. July 10 is the critical date at which roadwork cannot proceed without removal of the sediments.

Penny Baxter presented data from the recent sampling of sediment and surface soils in and near Base outfalls along 28th Street. In addition, sediment retention traps were installed in Base ditches to slow the migration of possible dioxin-containing sediments from beyond the Base boundaries. The areas sampled included Outfall 1 at Canal Road, Outfall 3, Outfall 4, Turkey Creek bridge at Canal Road, Ohio and Polk Bridge on Turkey Creek, and surface soils near Outfall 3. Results of this sampling are contained in a letter report dated May 26, 1995. General findings concluded that 1) dioxins were present in amounts exceeding the 4.7 parts per trillion level currently allowed by the State, 2) dioxin-containing sediments appear to contain higher amounts of total organic carbon, and 3) dioxins are generally found in a sediment "veneer" (recent sediments, less than approximately 30 years old) within the ditches. Approximately 480 cubic yards of sediment would require excavation to bring levels below the current State-allowed limit of 4.7 ppt.

Gordon Crane and Art Conrad opened the discussion of what to do from this point. The current circumstances require that dioxincontaining sediments be excavated to the 4.7 ppt level and properly disposed. Therefore, two problems are present: removal and disposal.

A discussion was held on a pending study by EPA that may raise the State's allowable levels of dioxin in soils and sediments. The study is currently near completion and in peer review. Indications are that the allowable levels will elevate above 4.7 ppt but be lower than the current EPA standard of 1 ppb.

Mr. Banks explained that the State currently considers the best available number for cleanup to be a health-based risk number derived from health-based equations. The State has adopted this conservative number in absence of other guidance from EPA. If the EPA's new guidance number is close to the 1 ppb level, the State may adopt the new allowable number. If the new EPA number is nearer the 100 ppt level, some excavation may be needed. An action item was planned to attempt to find out what the new allowable level will be from EPA. Mr. Banks and Mr. Crane will attempt to gain this information.

The second problem faced by the Base is disposal. If funds are located to allow excavation of the sediment, the problem remains of disposal since the cost of disposal is prohibitive. Currently, no landfills have been identified that will accept dioxin-containing materials labeled F027. Materials removed would require incineration prior to landfilling. Various options were discussed about how to handle excavated materials. The most promising option involves long-term storage of the excavated material. Mr. Banks said that the State would consider the possibility of creating a CAMU-like unit to allow a longer period storage. He stated that the State regulators will take another look at the regulations and policy where storage/disposal is concerned.

The group discussed various ways to address the presence of dioxin in various media. The idea of utilizing site specific risk versus the standard health risk approach was discussed. Ms. Wilson asked if the construction workers were at risk. Mr. Banks answered that the State does not look at short term exposure but follows the more conservative standard health-based risk methodologies. The State will hold to the standard risk methodology for areas outside the Base which results in a cleanup level of 4.7 ppt but conceded that site-specific risk methodologies may be appropriate for the Base itself.

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Mr. Banks expressed the need to monitor the risk from inhalation. The Base has made provisions though its contractor to monitor for dust hazard during the excavation efforts.

Mr. Banks stated that he had a rough draft consent order ready to be utilized. The consent order names the Air Force in addition to the Navy.

Mr. Crane presented a problem he has encountered with the railroad siding and fencing at Site 8. The gate to the area closing off the rail line is constantly being left open. To correct this problem the Base would like to move the fencing to exclude that portion of the rail that crosses a corner of the site. Surface soil samples collected in the area have values less than 6 ppt. Mr. Banks stated that he had no objection to the fencing being moved.

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